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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

ORIGINAL

BY HAND DELIVERY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW #TW-A235
Washington, DC 20554

Re: Petition of Keily Miller For Rule Making

Dear Ms. Salas:

Enclosed on behalf of Keily Miller, licensee of Station KHWG(FM) (Facility ID # 31618), Quincy, CA, are an original and four (4) copies of a Petition of Keily Miller for Rule Making to amend Section 73.202(b) Table of Allotments of FM Broadcast Stations..

In the event there are any questions concerning this matter, please let me know.

Sincerely yours,



John G. Holland
of LATHAM & WATKINS

Enclosures

cc: Keily Miller (Public File)
Lorraine W. Self

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Amendment of Section 73.202(b).)
Table of Allotments)
FM Broadcast Stations)
(Quincy, California))

ORIGINAL

PETITION OF KEILY MILLER FOR RULE MAKING

Keily Miller, licensee of Station KHWG at Quincy, California hereby seeks the institution of a rule making proceeding to amend Section 73.202(b) of the Federal Communications Commission's (the "Commission") rules by substituting Channel 262A for Channel 262C3 at Quincy, California.

The following changes are proposed to the FM Table of Allotments:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Quincy, California	240A, 262A	240A, 262C

As the attached Engineering Statement prepared by W. Richard Green & Associates shows, the proposed upgrade from Channel 262A to Channel 262C3 will allow KHWG to greatly enhance its coverage area, resulting in a net gain in both the area and population served by the Station. Station KHWG currently provides service to 5,988 persons within a 307.5 square kilometer area within its 60 DBW service contour. If the Station is upgraded to operate on Channel 262C3, the Station will serve 17,882 persons within a 4,701.5 square kilometer area, a populations increase of 199 percent. Further, the coordinates indicated in the Engineering Statement meet all of the domestic and foreign mileage separation requirements. Thus, the

proposed upgrade in the KHWG transmitter facilities to Channel 262C3 would better serve the City of Quincy and the public interest.

Accordingly, Petitioner respectfully request that the Commission commence a rule making proceeding looking toward the substitution of Channel 262A for Channel 262-C3 at Quincy, California.

Respectfully submitted,


Keily Miller

June 21, 2001

W. RICHARD GREEN AND ASSOCIATES
TELECOMMUNICATIONS ENGINEERING CONSULTANTS

3232 WILKINSON ROAD

CAMERON PARK, CA 95682

ENGINEERING STATEMENT

**PREPARED IN SUPPORT OF A
PETITION FOR RULEMAKING TO
AMEND THE FM TABLE OF ALLOTMENTS
TO CHANGE CHANNEL 262-A AT QUINCY, CA
TO CHANNEL 262-C3
JUNE 1, 2001**

SUMMARY

The following engineering statement has been prepared on behalf of Keily Miller, Licensee of KHWG at Quincy, California, in support of a petition to change the FM Table of Allotments from Channel 262-A @ Quincy, California to Channel 262-C3 (100.3 mHz). The proposed change complies with Section 73.202 of the Commission's Rules. The proposal complies with Section 73.207 of the Rules for domestic facilities and complies with Section 73.315 concerning 70-dBu service to the Community of License.

This statement is complete with the following Exhibits:

- E-1 FM Channel Spacing Study (table)
- E-2 FM Channel 262-C3 allocation site Map
- E-3 FM Spacing Study Map
- E-4 FM Predicted Signal Coverage Map

REFERENCE COORDINATES and TECHNICAL CHARACTERISTICS

The reference coordinates for the proposed Channel 262-C3 at Quincy, CA are:

North Latitude: 40-03-32
West Longitude: 120-54-36

The eight radial HAAT for the reference coordinates is 630 meters. The radiation center used for the contour study is, therefore, 2004 meters AMSL for a HAAT of 653 meters.

A transmitter facility at the theoretical maximum power and height at the allocation coordinates would cover 4701.5 Sq Km and serve 17,882 persons (2000 Census).

COMMUNITY CHARACTERISTICS

Quincy is located in Plumas County, California. The U.S. Census data for the city and county follow:

	<u>Quincy City</u>	<u>Plumas County</u>
2000 Census	4,963	20,824

There are currently two commercial FM channels allocated at the City of Quincy, California, channel 262-A (KHWG COMMERCIAL STATION) and channel 240-A (KNLF NON COMMERCIAL STATION).

DISCUSSION

KHWG-FM is the only commercial FM station licensed to the City of Quincy, Ca, the seat of Plumas County.

The proposed upgrade from channel 262-A to channel 262-C3 will increase the predicted coverage by 2300 SQ KM and serve 88% of the total population of Plumas County.

The coordinates indicated herein meet all of the domestic and foreign mileage separation requirements. The proposed KHWG FM transmitter site has been designated by the US Forest Service, Plumas County Office.

CONCLUSION

The proposed upgrade in the KHWG transmitter facilities to class C-3 would better serve the City of Quincy, Plumas County and the public interest.

The foregoing was prepared on behalf of Keily Miller by W. Richard Green of W. Richard Green & Associates, Cameron park, California whose qualifications are a matter of record with the Federal Communications Commission. The statements made herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and Correct.

Date: 06-01-2001

By William R. Green
W. Richard Green
for W. Richard Green & Associates
Cameron Park, California

EXHIBIT E-1

FM CHANNEL SPACING STUDY

KHWG AT MT HOUGH AREA TO LOCATE STUDY CH 262-C3

Proposed latitude: N 40-03-32

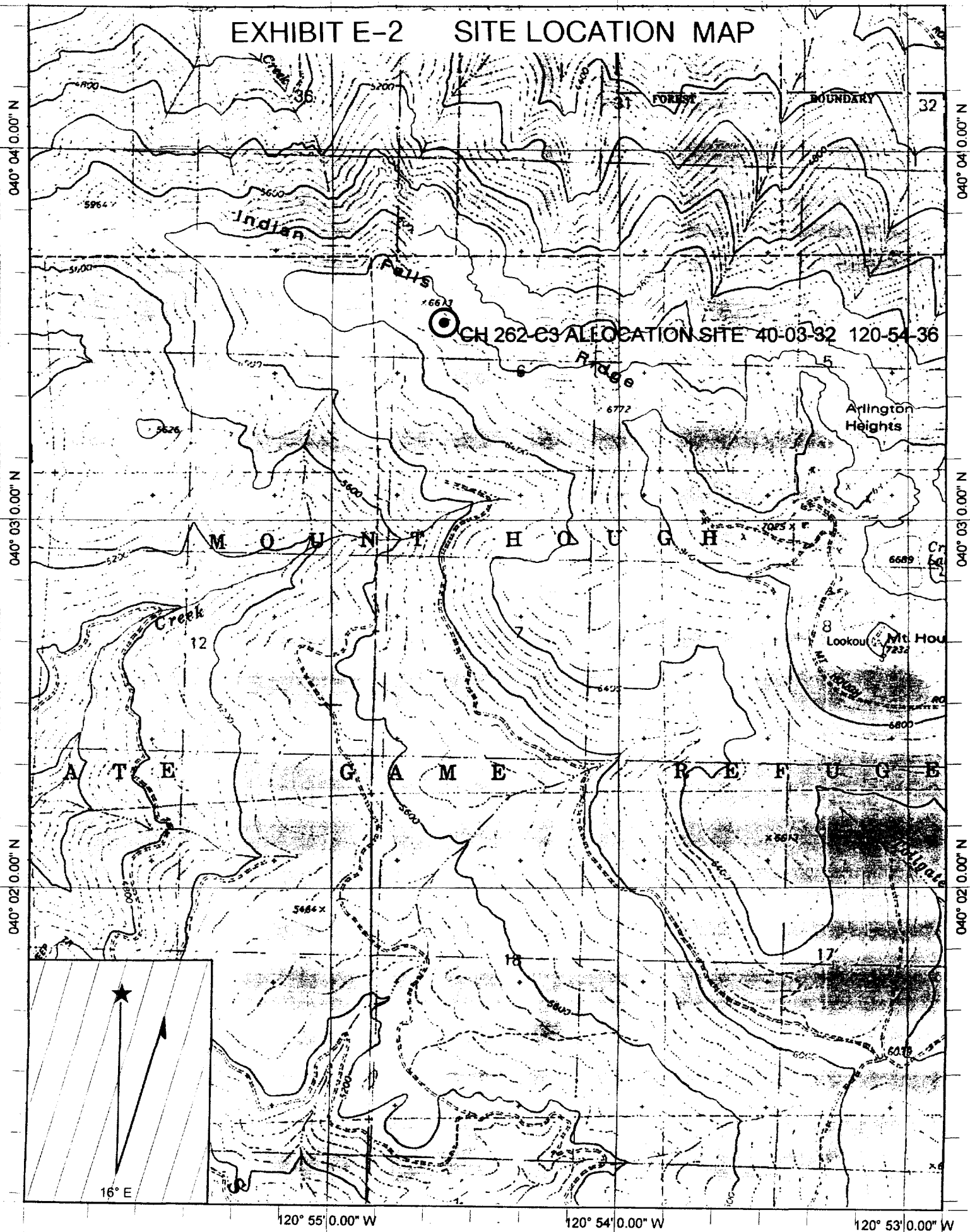
Proposed longitude: W 120-54-36

Proposed channel: 262-C3

CH	Call	Record	City	ST	Status	Bear.	Dist.	Reqd. Dist.	Result
265A	KRZQ-FM	28507	SPARKS	NV	LIC	128.3	123.2	42.0	
208A	951127MA	28522	RENO	NV	APP	119.3	109.5	12.0	
261C2	KTHX-FM	28530	INCLINE VILLAGE	NV	LIC	133.1	121.1	117.0	4.0
261C1	FR ADD	28541	DAYTON	NV	ADD	114.4	150.3	144.0	6.0
261C2		28559	INCLINE VILLAGE	NV	DEL	133.1	121.1	117.0	4.0
262A	KSPY	29020	QUINCY	CA	LIC	193.3	13.9	142.0	-128.0
208B1	KVMR	29063	NEVADA CITY	CA	LIC	182.9	90.3	14.0	
262A	KSPY	29066	QUINCY	CA	APP	193.1	13.8	142.0	-128.0
263B	KZZO	29540	SACRAMENTO	CA	LIC	185.7	158.1	145.0	13.0
263B	KZZO	29622	SACRAMENTO	CA	CP	185.7	158.1	145.0	13.0
260B	KRCX-FM	29640	MARYSVILLE	CA	LIC	219.7	122.8	71.0	
209C2	KNCA	29688	BURNEY	CA	LIC	321.5	116.4	17.0	
209C	KNCA	29695	BURNEY	CA	APP	320.8	122.0	31.0	
259A	960806MD	29697	CHESTER	CA	CP	307.1	41.7	42.0	0.0
259A	ALLOTM	29706	CHESTER	CA	VACANT	316.4	42.2	42.0	0.0
264B	KCEZ	30190	CORNING	CA	LIC	263.2	147.9	71.0	
261C3	KZRO	30301	DUNSMUIR	CA	CP MOD	321.1	176.9	99.0	
261C3	KZRO	30326	DUNSMUIR	CA	LIC	321.2	177.1	99.0	
262C1	KQEX	31457	FORTUNA	CA	CP MOD	279.5	274.9	211.0	
262C1	KQEX	31474	FORTUNA	CA	CP	279.5	274.9	211.0	

***** End of channel 262 study *****

EXHIBIT E-2 SITE LOCATION MAP



120° 54' 0.00" W

120° 53' 30.00" W

120° 53' 0.00" W

EXHIBIT E-2 (EX) SITE LOCATION MAP

040° 04' 0.00" N
040° 03' 40.00" N
040° 03' 20.00" N
040° 03' 0.00" N



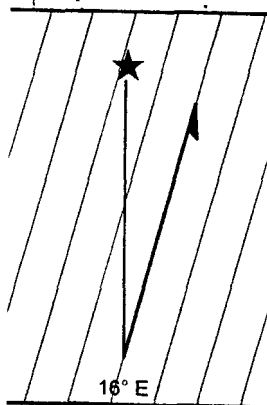
CH 262-C3 ALLOCATION SITE 40-03-32 120-54-36

Ridge

Arlington Heights

H O U G H

Crustal



120° 54' 0.00" W

120° 53' 30.00" W

120° 53' 0.00" W

ALLCATION STUDY MAP





FMSR™: KHWG C3 ALLOCATION MAP.map

Prop. model: FCC-EDX
Time: 50.0% Loc.: 50.0%
Prediction Confidence Margin: 0.0dB
Climate: Continental Temperate
Land use (clutter): none
Atmospheric Abs.: none
K Factor: 1.333
RX Antenna - Type: OMNI
Height: 2.0 m AGL Gain: -2.15 dBd

Sites

Site: KHWG
N40°03'32.00" W120°54'36.00" 1957.0 m
KHWG * Tx.Ht.AGL: 47.0 m ERPd: 26.65 dBW
Grp: 1 Omni-HH/0.0° 100.3000 MHz

KILOMETERS

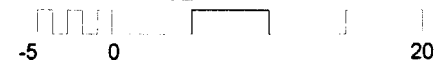


EXHIBIT E-4

KHWG PREDICTED SIGNAL COVERAGE MAP
F(50/50) 60-dBu & 70-dBu CONTOURS